

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

DSCF Standard Mail Load Leveling

Docket No. N2014-1

PUBLIC REPRESENTATIVE
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS MALONE
(PR/USPS-T1-1-10)

(January 3, 2014)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents.

DEFINITIONS AND INSTRUCTIONS

1. Each of the following discovery requests is continuing in nature and the Public Representative requests that if you obtain any additional responsive information or documents at any later date, you promptly so inform the Public Representative and submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any data, information, or documents requested herein, the party to whom the discovery request is directed should provide a privilege log (see, *e.g.*, Docket No. C99-1, P.O. Ruling C99-1/9 at 4). Specifically, “the party must expressly make the claim and describe the nature of the documents, communications, or tangible things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim.” Fed. R. Civ. P. 26(b)(5).
3. If in response to any discovery request the Postal Service is unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.
4. In responding to any questions contained in the attached discovery requests that

Docket No. N2014-1

require any calculations, analysis, assumptions, or studies that have been prepared, please provide and identify copies of such calculations, analysis, assumptions, studies, and all workpapers relating thereto.

5. If an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.

6. If data or information is not available in the exact format or level of detail requested, please provide such data or information (1) in a substantially similar format or level of detail or (2) in a format susceptible to being converted to the requested format and level of detail.

7. The term "Postal Service" includes all agents, employees, officers, directors, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors, subcontractors to the Postal Service, and the Postal Service Office of Inspector General.

8. The terms "document" or "documents" includes but is not limited to the original or a copy of any letter, email, note, spreadsheet, memorandum, directive, report, study, meeting minutes, contract, diary entry or schedule, presentation, print out, speech, testimony, pamphlet, chart, tabulation, workpaper, draft, recording, and other writing or retrievable data or whatever kind or nature to which the Postal Service has or has had access to, regardless of origin or location, hardcopy or electronic, handwritten or typed. Documents should be produced in the way they are maintained.

9. The term "describe" means to detail in full, with specificity, the event or situation at issue.

10. The term "identify," (1) when used with regard to a person, means to provide the full name and position of the person, and (2) when used with regard to a document means to describe the subject matter of the document, its author, the date, and any intended recipients.

11. The term "communication(s)" means the transmittal of information by any means and includes communications or any kind, whether written, oral, electronic, or other.

12. All "documents," as defined above, responsive to discovery requests that can be located, discovered or obtained by reasonably diligent efforts, including without limitation all documents possessed by (a) you or your counsel or (b) any other person or

Docket No. N2014-1

entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand, should be produced.

13. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

14. The term “workpapers” includes all backup material whether prepared manually, mechanically or electronically. Such workpapers should, if necessary, be prepared as part of the witness’s responses and should allow a third party to understand how the witness took data from a primary source and developed that data to achieve a final result. If Excel-type spreadsheets are used, please provide a version of the worksheets that include the underlying formulas for each cell.

15. Unless otherwise noted, all postal related terms have the definitions of the current version of the Postal Service’s Publication 32 – Glossary of Postal Terms.

Respectfully Submitted,

/s/ Anne J. Siarnacki
Anne J. Siarnacki
Public Representative for
Docket No. N2014-1

901 New York Avenue, N.W.
Washington, DC 20268-0001
(202) 789-6880; Fax (202) 789-6891
e-mail: anne.siarnacki@prc.gov

PR/USPS-T1- 1

On page 5 of your testimony, you state that the proposed change “would also affect DSCF Standard Mail entered at the Section Center Facility (SCF) in San Juan, Puerto Rico and destined for the U.S. Virgin Islands, and also any DSCF Standard Mail destined for American Samoa. For such mail accepted on Friday, the expected delivery day would change from Tuesday to Wednesday; and for such mail accepted on Saturday, the expected delivery day would change from Wednesday to Thursday.”

- a. Please confirm that all DSCF Standard Mail dropped at the SCF in Puerto Rico and destined to the U.S. Virgin Islands, or destined to American Samoa presently has a 4-day service standard. If not confirmed, please explain.
- b. Please provide the FY 2013 DSCF Standard Mail volume that (1) was dropped at the SCF in Puerto Rico and destined to the U.S. Virgin Islands and (2) was destined to American Samoa, disaggregated by day of the week.
- c. Please describe and to the extent possible, quantify the benefits the Postal Service expects to realize by changing the delivery standard for DSCF Standard Mail (1) entered at the SCF in San Juan, Puerto Rico and destined to the U.S. Virgin Islands and (2) destined to American Samoa.
- d. Please explain whether the results of the South Jersey Operations Test are representative of the benefits the Postal Service expects to realize by changing the delivery standard for (1) DSCF Standard Mail entered at the SCF in San Juan, Puerto Rico and destined to the U.S. Virgin Islands and (2) any DSCF Standard Mail destined to American Samoa.

PR/USPS-T1-2

On page 4 of your testimony, Table 2 contains a summary of FY 2013 Q1 volume for Full Service IMb Standard Mail and number of dropship appointments disaggregated by day of the week.

- a. Please provide the disaggregated data, by facility and day of the week, used to create this table.
- b. Please provide the volume and number of dropship appointments, disaggregated by facility and day of the week, for Full Service IMb Standard Mail for FY 2013 Q2, Q3, and Q4.
- c. Please provide the volume and number of dropship appointments, disaggregated by facility and day of the week, for non-Full Service IMb Standard Mail for FY 2013 Q1, Q2, Q3, and Q4.

PR/USPS-T1-3

On pages 8-11 of your testimony, you describe MTAC Workgroup 157, a committee of mailing industry representatives and postal managers which discussed strategies for workload leveling prior to the South Jersey Operations Test.

- a. Please identify, describe, and provide all documents pertaining to MTAC Workgroup 157 meetings, including but not limited to meeting minutes, meeting notices, and MTAC presentations.
- b. Please identify any members of MTAC Workgroup 157 that mail fewer than 100,000 DSCF Standard Mail pieces/year.
- c. Please identify and provide any feedback from any MTAC member that supported an earlier CET for Friday and Saturday instead of altered service standard for DSCF Standard Mail accepted on Fridays and Saturdays.

PR/USPS-T1-4

On page 15 of your testimony, you state that some mailers with a strong preference for Monday delivery and would enter mail on Thursday to preserve Monday delivery, but believe “based on earlier discussions with mailers” that many mailers will not change their mail entry patterns.

- a. Please identify, describe, and provide all documents detailing these discussions with mailers.
- b. Please identify, describe, and provide all documents related to any nationwide or substantially nationwide study or survey undertaken by the Postal Service to assess the volume of DSCF Standard Mail that would be entered on a different day under the adjusted service standard. If no such study or survey was undertaken, please describe the reason(s) why not.

PR/USPS-T1-5

On page 12 of your testimony, you identify two reasons that the South Jersey Plant was selected for the operations test: (1) it has been serving as a pilot site for the roll-out of several Lean Mail Processing standardization initiatives and (2) it was accessible to headquarters personnel supervising the test.

- a. Please describe how South Jersey Plan’s experience as a pilot site for the roll-out of several Lean Mail Processing standardization initiatives made it more suitable for the operations test.

Docket No. N2014-1

- b. To what extent may the South Jersey Plan's experience as a pilot site for the roll-out of several Lean Mail Processing standardization initiatives positively skewed the results of the operations test?
- c. Please describe, in detail, any additional considerations that led to the selection of the South Jersey Plant for the operations test.

PR/USPS-T1-6

On page 16 of your testimony, you identify a second operations test, conducted in December 2013, in the Capital District and state that "[t]he Postal Service anticipates compiling periodic reports of data from this test in a library reference."

- a. What were/are the dates for the Capital District Operations Test?
- b. Please explain all of the reasons why the Capital District selected for the second operations test.
- c. What additional information did the Postal Service hope to learn from the Capital District Operations Test?
- d. When does the Postal Service expect to file the library reference detailing the Capital District Operations Test in this proceeding?

PR/USPS-T1-7

On page 16 of your testimony, you state that the Postal Service may test the operating concept in additional administrative districts during the pendency of this proceeding.

- a. Please describe any current plans to conduct additional operations tests.
- b. Please describe the selection criteria for choosing the locations for additional operations tests.
- c. Please describe the projected dates and locations for any additional operations tests currently planned.
- d. When does the Postal Service expect to finalize its determinations concerning additional operations tests?

PR/USPS-T1-8

On page 17 of your testimony, Table 7 "Percentage City Carriers Returning After 1700 Hours" contains the percentage of carriers returning after 5 pm since October of 2005.

- a. Please provide the data used to create Table 7.
- b. Please identify the postal database(s) used as a source for Table 7.

PR/USPS-T1-9

Library Reference USPS-LR-N2014-1/2 associated with your testimony contains estimates of the mail processing and carrier route labor impacts of the Postal Service's proposal.

- a. Do you estimate that implementation of the Load Leveling Plan will decrease mail processing labor workhours by roughly 2 percent, if implemented? If not, please explain.
- b. Do you estimate that implementation of the Load Leveling Plan will decrease city carrier overtime workhours by roughly 35 percent, if implemented? If not, please explain.
- c. Please identify, describe, and provide all documents detailing the savings the Postal Service expects to realize by implementing the Load Leveling Plan nationwide.

PR/USPS-T1-10

Library Reference USPS-LR-N2014-1/2 associated with your testimony contains estimates of the mail processing and carrier route labor impacts of the Postal Service's proposal.

- a. File "SJ FI Results.xls" tab "Data" contains MODS FHP, TPF, TPH and Workhours by day of the week from 8/1/13 to 9/30/13 for ZIPs 080-084. Please provide this data disaggregated by MODS operation.
- b. File "SJ F2 Results.xls" tab "Data" contains DOIS data by day of the week from 8/1/13 to 9/30/13. Please provide this data disaggregated by route.